

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION



MISSOURI STATE OPERATING PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo. as amended, hereinafter, the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92nd Congress) as amended,

Permit No. MO-0136549

Owner: BP U.S. Pipelines & Logistics
Address: 8230 Whitcomb Street, Merrillville, IN 46410

Continuing Authority:
Address: Same as above

Facility Name: BP Sugar Creek Marketing Terminal
Facility Address: 1000 North Sterling Avenue, Sugar Creek, MO 64054

Legal Description: See page two
UTM Coordinates: See page two

Receiving Stream: Sugar Creek (U)
First Classified Stream and ID: Missouri River (P) (00356)
USGS Basin & Sub-watershed No.: (10300101 – 050003)

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

FACILITY DESCRIPTION

All Outfalls – Stormwater only – SIC #5171 – No certified operator required

Stormwater from petroleum pipeline terminal and truck loading racks located near a former petroleum refinery site.
See page two for outfall details.

This permit authorizes only wastewater discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in accordance with Section 644.051.6 of the Law.

January 21, 2011
Effective Date


Sara Parker Pauley, Director, Department of Natural Resources

January 20, 2016
Expiration Date


Dorothy Franklin, Acting Director, Kansas City Regional Office

FACILITY DESCRIPTION (continued)

Outfall #001

Stormwater

Design Flow is 1.5 MGD.

Legal Description: SE $\frac{1}{4}$, SE $\frac{1}{4}$, Sec 28, T50N, R32W, Jackson County

UTM Coordinates: X = 375146, Y = 4331089

Outfall #002

Stormwater/retention basin

Design flow is 2.1 MGD.

Legal Description: NW $\frac{1}{4}$, SE $\frac{1}{4}$, Sec.28, T50N, R32W, Jackson County

UTM Coordinates: X = 375094, Y = 4331263

Terminal Tank Area Stormwater Retention Pond (drains through Outfall #002)

UTM Coordinates: X = 375432, Y = 4331368

Legal Description: NE $\frac{1}{4}$, SE $\frac{1}{4}$, Sec. 28, T50N, R32W, Jackson County

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					PAGE NUMBER 3 of 7	
PERMIT NUMBER MO-0136549						
The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:						
OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
<u>Outfalls #001 & #002</u>						
Flow	MGD	*		*	Twice/year**	24 Hour Estimate
Biochemical Oxygen Demand ₅	mg/L	48		26	Twice/year**	grab
pH – Units	SU	***		***	Twice/year**	grab
Total Petroleum Hydrocarbons	mg/L	10		10	Twice/year**	grab
Phenolic Compounds	mg/L	0.35		0.17	Twice/year**	grab
Chemical Oxygen Demand	mg/L	360		180	Twice/year**	grab
BETX****	mg/L	0.75		0.75	Twice/year**	grab
Methyl Tertiary Butyl Ether	mg/L	0.020		0.020	Twice/year**	grab
Ethanol	mg/L	*		*	Twice/year**	grab
Total Chromium	mg/L	0.73		0.43	Twice/year**	grab
Lead, Total Recoverable	µg/L	188		94	Twice/year**	grab
Total Hardness	mg/L	*		*	Twice/year**	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>SEMI-ANNUALLY</u> ; THE FIRST REPORT IS DUE <u>APRIL 28, 2011</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
B. STANDARD CONDITIONS						
IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Part I</u> STANDARD CONDITIONS DATED <u>October 1, 1980</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.						

MO 780-0010 (8/91)

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

* Monitoring requirement only.

** Sample twice per year according to the table below. All samples must be collected from a precipitation event greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable precipitation event. Grab samples should be taken during the first fifteen (15) minutes of flow if feasible, but no later than the first sixty (60) minutes of flow.

Sample discharge at least once for the months of:	Report is due:
<ul style="list-style-type: none"> October, November, December, January, February, March, (4th and 1st Quarters) April, May, June, July, August, September, (2nd and 3rd Quarters) 	April 28 th October 28 th

*** pH is measured in pH units and is not to be averaged. The pH is limited to the range of 6.5-9.0 pH units.

**** Total BETX shall be measured as the sum of Benzene, Ethylbenzene, Toluene and Xylene.

C. SPECIAL CONDITIONS

1. Terminal Tank Area Stormwater Retention Pond Discharges

All discharges from the stormwater retention basin must meet established permit limits for the following parameters:

- pH – Units
- Total Petroleum Hydrocarbons
- Chemical Oxygen Demand
- BETX
- Methyl Tertiary Butyl Ether
- Ethanol
- Lead, Total Recoverable

Water that has accumulated in the terminal tank area stormwater retention pond must be analyzed for possible contamination prior to release. When the presence of contamination exceeds the permitted limits, the storm water shall be diverted to a permitted treatment facility or receive appropriate treatment before release through Outfall #002. If the accumulated rainfall is sufficient to endanger the electrical equipment or cause possible tank flotation, accumulation of storm water may be released before sample results are available. If the discharge fails to meet the permit limits, then the facility must follow the section below titled

D. REPORTING OF EFFLUENT VIOLATIONS.

2. This permit may be reopened and modified, or alternatively revoked and reissued, to:

- (a) Comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:
 - (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
 - (2) controls any pollutant not limited in the permit.
- (b) Incorporate new or modified effluent limitations or other conditions, if the result of a waste load allocation study, toxicity test or other information indicates changes are necessary to assure compliance with Missouri's Water Quality Standards.
- (c) Incorporate new or modified effluent limitations or other conditions if, as the result of a watershed analysis, a Total Maximum Daily Load (TMDL) limitation is developed for the receiving waters which are currently included in Missouri's list of waters of the state not fully achieving the state's water quality standards, also called the 303(d) list.

The permit as modified or reissued under this paragraph shall also contain any other requirements of the Clean Water Act then applicable.

3. All outfalls must be clearly marked in the field.

4. Changes in Discharges of Toxic Substances

The permittee shall notify the Director as soon as it knows or has reason to believe:

- (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 µg/L);
 - (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,5 dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
 - (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
 - (4) The level established in Part A of the permit by the Director.
- (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.
- (c) That the effluent limit established in part A of the permit will be exceeded.

5. Report as no-discharge when a discharge does not occur during the report period.

C. SPECIAL CONDITIONS (continued)

6. Water Quality Standards

- (a) Discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
 - (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
 - (1) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
 - (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
 - (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
 - (4) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
 - (5) There shall be no significant human health hazard from incidental contact with the water;
 - (6) There shall be no acute toxicity to livestock or wildlife watering;
 - (7) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
 - (8) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.
7. The permittee shall develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must be kept on-site and should not be sent to DNR unless specifically requested. The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP in accordance with the concepts and methods described in the following document:

Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators, (Document number EPA 833-B-09-002) published by the United States Environmental Protection Agency (USEPA) in February 2009.

The SWPPP must include the following:

- (a) An assessment of all storm water discharges associated with this facility. This must include a list of potential contaminants and an annual estimate of amounts that will be used in the described activities.
 - (b) A listing of specific Best Management Practices (BMPs) and a narrative explaining how BMPs will be implemented to control and minimize the amount of potential contaminants that may enter storm water. Minimum BMPs are listed in SPECIAL CONDITIONS #8 below.
 - (c) The SWPPP must include a schedule for monthly site inspections and a brief written report. The inspections must include observation and evaluation of BMP effectiveness, deficiencies, and corrective measures that will be taken. The Department must be notified within fifteen (15) days by letter of any corrections of deficiencies. Deficiencies that consist of minor repairs or maintenance must be corrected within seven (7) days. Deficiencies that require additional time or installation of a treatment device to correct should be detailed in the written notification. Installation of a treatment device, such as an oil water separator, may require a construction permit. Inspection reports must be kept on site with the SWPPP. These must be made available to DNR personnel upon request.
 - (d) A provision for designating an individual to be responsible for environmental matters.
 - (e) A provision for providing training to all personnel involved in material handling and storage, and housekeeping of maintenance and cleaning areas. Proof of training shall be submitted on request of DNR.
8. Permittee shall adhere to the following minimum Best Management Practices:
- (a) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, or warehouse activities and thereby prevent the contamination of storm water from these substances.
 - (b) Provide collection facilities and arrange for proper disposal of waste products including but not limited to petroleum waste products, and solvents.

C. SPECIAL CONDITIONS (continued)

- (c) Store all paint, solvents, petroleum products and petroleum waste products (except fuels), and storage containers (such as drums, cans, or cartons) so that these materials are not exposed to storm water or provide other prescribed BMP's such as plastic lids and/or portable spill pans to prevent the commingling of storm water with container contents. Commingled water may not be discharged under this permit. Provide spill prevention control, and/or management sufficient to prevent any spills of these pollutants from entering waters of the state. Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater.
 - (d) Provide good housekeeping practices on the site to keep trash from entry into waters of the state.
 - (e) Provide sediment and erosion control sufficient to prevent or control sediment loss off of the property.
9. The purpose of the SWPPP and the BMPs listed therein is to prevent pollutants from entering waters of the state. A deficiency of a BMP means it was not effective in preventing pollution [10 CSR20-2.010(56)] of waters of the state, or failed to achieve compliance with benchmarks. Corrective action means the facility took steps to eliminate the deficiency.
10. All fueling facilities present on the site shall adhere to applicable federal and state regulations concerning underground storage, above ground storage, and dispensers, including spill prevention, control and counter measures.
11. All spills must be **cleaned up** within 24 hours or as soon as possible, and a written report of the incident supplied with the facility's Discharge Monitoring Report. The following spills must be **reported** to the department at the earliest practicable moment, but no greater than 24 hours after the spill occurs:
- (a) Any spill, of any material, that leaves the property of the facility;
 - (b) Any spill, of any material outside of secondary containment and exposed to precipitation, greater than 25 gallons or equivalent volume of solid material.
- The department may require the submittal of a written report detailing measures taken to clean up the spill within 5 days of the spill. Whether the written report is submitted with the Discharge Monitoring Report or required to be submitted within 5 days, it must include the type of material spilled, volume, date of spill, date clean-up completed, clean-up method, and final disposal method. If the spill occurs outside of normal business hours, or if the permit holder cannot reach regional office staff for any reason, the permit holder is instructed to report the spill to the department's 24 hour Environmental Emergency Response hotline at (573) 634-2436. Leaving a message on a department staff member voice-mail does not satisfy this reporting requirement. These reporting requirements apply whether or not the spill results in chemicals or materials leaving the permitted property or reaching waters of the state. This requirement is in addition to the Noncompliance Reporting requirement found in Standard Conditions Part I.
12. Substances, regulated by federal law under the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), that are transported, stored, or used for maintenance, cleaning or repair, shall be managed according to RCRA and CERCLA.
13. The permittee is responsible for the development of an annual operating report that must be submitted by October 28 of each year (notwithstanding any reporting requirements contained in the attached "standard conditions"). This report shall detail any unusual occurrences such as spills, tank failures or overflows, ruptured piping, fishkills, fire fighting activities, or other upset which resulted in the loss of product. Product includes, but is not limited to fuels, paints, or other chemicals. The report shall also detail any remedial work undertaken to recover product or clean up the site. The report must also indicate if nothing unusual has occurred.
14. All storm water from the Terminal Truck Loading Rack area will be discharged to the sanitary sewer. Water from the Terminal Tank Area Stormwater Retention Pond may be discharged through Outfall #002 if it meets the requirements set forth in Special Condition #1.

D. REPORTING OF EFFLUENT VIOLATIONS

If any of the sampling results from any of the outfalls show any violation of the permit discharge limitations, written notification shall be made to the Department of Natural Resources within five (5) days of notification of analytical results. Notification shall indicate the date(s) of sample collection, the analytical results, and permit number, and shall include a statement concerning the revisions or modifications in management practices that are being implemented to address the violation of the limitations that occurred.

After a violation has been reported, a sample of storm water runoff resulting from the next rainfall greater than 0.1 inches shall be collected at outfall(s) for which the violation occurred. Analytical results of this sample shall be submitted in writing to the Department of Natural Resources (this paragraph supersedes Standard Conditions Part I, Section B: 2.a. Noncompliance Notification).

E. RECORDS, RETENTION AND RECORDING

Monitoring reports shall be submitted within 28 days after the end of each monitoring period. All sampling data shall be maintained by the permittee for a period of five (5) years and shall be supplied to the Department of Natural Resources upon request (supersedes Standard Conditions Part I, Section A: 7. Records Retention). A copy of all of the sampling data must be submitted with an application for reissuance of this permit.

F. PERMIT TRANSFER

This permit may be transferred to a new owner by submitting an "Application for Transfer of Operating Permit" signed by the seller and buyer of the facility, along with the appropriate modification fee.

G. PERMIT RENEWAL REQUIREMENTS

Unless this permit is terminated, the permittee shall submit an application for the renewal of this permit no later than six (6) months prior to the permit's expiration date. Failure to apply for renewal may result in termination of this permit and enforcement action to compel compliance with this condition and the Missouri Clean Water Law.

H. TERMINATION

In order to terminate this permit, the permittee shall notify the department by submitting Form J, included with the State Operating Permit. The permittee shall complete Form J and mail it to the department at the address noted in the cover letter of this permit. Proper closure of any storage structure is required prior to permit termination. A closure plan shall be submitted to the department and approved prior to initiating closure activities.

I. DUTY OF COMPLIANCE

The permittee shall comply with all conditions of this permit. Any noncompliance with this permit constitutes a violation of Chapter 644, Missouri Clean Water Law, and 10 CSR 20-6. Noncompliance may result in enforcement action, termination of this authorization, or denial of the permittee's request for renewal.

Missouri Department of Natural Resources
FACT SHEET
FOR THE PURPOSE OF ISSUANCE OF A NEW PERMIT FOR EXISTING DISCHARGES
OF
MO-0136549
BP SUGAR CREEK MARKETING TERMINAL

The Federal Water Pollution Control Act ("Clean Water Act" Section 402 Public Law 92-500 as amended) established the National Pollution Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of storm water from certain point sources. All such discharges are unlawful without a permit (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified.

As per [40 CFR Part 124.8(a)] and [10 CSR 20-6.020(1)2.] a Factsheet shall be prepared to give pertinent information regarding the applicable regulations, rationale for the development of effluent limitations and conditions, and the public participation process for the Missouri State Operating Permit (operating permit) listed below.

A Factsheet is not an enforceable part of an operating permit.

This Factsheet is for a Major ☐, Minor ☒, Industrial Facility ☐; Variance ☐;
Master General Permit ☐; General Permit Covered Facility ☐; and/or permit with widespread public interest ☐.

Part I – Facility Information

Facility Type: Petroleum pipeline terminal
Facility SIC Code(s): 5171

Facility Description:

Stormwater only/stormwater retention basin

Have any changes occurred at this facility or in the receiving water body that effects effluent limit derivation?
☒, - No.

Application Date: 07/22/2010
Expiration Date: NA
Last Inspection: NA

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (MGD)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
#001	2.6	BMP	Stormwater	0.51
#002	2.1	BMP	Stormwater	0.40

Outfall #001

Legal Description: SE ¼, SE ¼, Sec 28, T50N, R32W, Jackson County

UTM Coordinates: X = 375146, Y = 4331089

Receiving Stream: Sugar Creek (U)

First Classified Stream and ID: Missouri River (P) (00356)

USGS Basin & Sub-watershed No.: (10300101 – 050003)

Outfall #002

Legal Description: NW ¼, SE ¼, Sec.28, T50N, R32W, Jackson County
UTM Coordinates: X = 375094, Y = 4331263
Receiving Stream: Sugar Creek (U)
First Classified Stream and ID: Missouri River (P) (00356)
USGS Basin & Sub-watershed No.: (10300101 – 050003)

Terminal Tank Area Stormwater Retention Pond

UTM Coordinates: X = 375432, Y = 4331368
Legal Description: NE ¼, SE ¼, Sec. 28, T50N, R32W, Jackson County

Comments:

Outfalls #001 & #002 were previously covered by permit #MO-0004774, BP Products NA, Inc., Former Amoco Sugar Creek Facility, as outfalls #006 & #009 respectively. BP has requested, and has submitted the appropriate applications and fees, to modify permit #MO-0004774 to remove outfalls #006 & #009 and to create a new site specific permit covering this area. This will expedite the transfer of operating permit for these two outfalls upon sale of the pipeline terminal and marketing facilities to a new entity. The remaining five outfalls at the former refinery site will remain under permit #MO-0004774.

Above ground fuel storage tanks in the terminal tankage area have containment dikes that prevent stormwater from reaching outfall #002 until released. Previously this facility sampled water from each diked area before releasing it. The facility recently constructed a stormwater retention basin in the terminal area to which each diked area is drained. Rather than sampling each individual diked area prior to release, water from the stormwater retention basin is sampled prior to release. If accumulated water meets permit limitations the basin is drained to outfall #002. If permit limitations are not met accumulated water is sent to the POTW for treatment.

Receiving Water Body's Water Quality & Facility Performance History:

Discharge monitoring reports for permit #MO-0004774 (outfalls #006 & #009) dating back to the 2009 renewal were reviewed and it was found that BOD and COD limitations were exceeded once at outfall #006 and BOD limitations were exceeded once at outfall #009.

Part II – Operator Certification Requirements

As per [10 CSR 20-6.010(8) Terms and Conditions of a Permit], permittees shall operate and maintain facilities to comply with the Missouri Clean Water Law and applicable permit conditions and regulations. Operators or supervisors of operations at regulated wastewater treatment facilities shall be certified in accordance with [10 CSR 20-9.020(2)] and any other applicable state law or regulation. As per [10 CSR 20-9.010(2)(A)], requirements for operation by certified personnel shall apply to all wastewater treatment systems, if applicable, as listed below:

Check boxes below that are applicable to the facility;

- Owned or operated by or for:
 - Municipalities ☐
 - Public Sewer District: ☐
 - County ☐
 - Public Water Supply Districts: ☐
 - Private sewer company regulated by the Public Service Commission: ☐
 - State or Federal agencies: ☐

Each of the above entities are only applicable if they have a Population Equivalent greater than two hundred (200) and/or fifty (50) or more service connections.

Not Applicable ☒; This facility is not required to have a certified operator.

Part III – Receiving Stream Information

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

As per Missouri's Effluent Regulations [10 CSR 20-7.015], the waters of the state are divided into the below listed seven (7) categories. Each category lists effluent limitations for specific parameters, which are presented in each outfall's Effluent Limitation Table and further discussed in the Derivation & Discussion of Limits section.

Missouri or Mississippi River [10 CSR 20-7.015(2)]: ☐
 Lake or Reservoir [10 CSR 20-7.015(3)]: ☐
 Losing [10 CSR 20-7.015(4)]: ☐
 Metropolitan No-Discharge [10 CSR 20-7.015(5)]: ☐
 Special Stream [10 CSR 20-7.015(6)]: ☐
 Subsurface Water [10 CSR 20-7.015(7)]: ☐
 All Other Waters [10 CSR 20-7.015(8)]: ☒

10 CSR 20-7.031 Missouri Water Quality Standards, the Department defines the Clean Water Commission water quality objectives in terms of "water uses to be maintained and the criteria to protect those uses." The receiving stream and/or 1st classified receiving stream's beneficial water uses to be maintained are located in the Receiving Stream Table located below in accordance with [10 CSR 20-7.031(3)].

RECEIVING STREAM(S) TABLE:

WATERBODY NAME	CLASS	WBID	DESIGNATED USES*	8-DIGIT HUC	EDU**
Sugar Creek	U	NA	General Criteria	10300101	Central Plains/ Blackwater/ Lamine
Missouri River	P	00356	IRR, LWW, AQL, SCR, DWS, IND, WBC-B***		

* - Irrigation (IRR), Livestock & Wildlife Watering (LWW), Protection of Warm Water Aquatic Life and Human Health-Fish Consumption (AQL), Cool Water Fishery (CLF), Cold Water Fishery (CDF), Whole Body Contact Recreation (WBC), Secondary Contact Recreation (SCR), Drinking Water Supply (DWS), Industrial (IND), Groundwater (GRW).

** - Ecological Drainage Unit

*** - UAA has not been conducted.

RECEIVING STREAM(S) LOW-FLOW VALUES TABLE:

RECEIVING STREAM (U, C, P)	LOW-FLOW VALUES (CFS)		
	1Q10	7Q10	30Q10
Missouri River (P)	4579.07	5800.27	10187.53

MIXING CONSIDERATIONS:

Mixing zones and zones of initial dilution are not allowed. All effluent from this facility is stormwater runoff. Permit limits, categorical standards, and water quality standards must be met at the end of the pipe.

RECEIVING STREAM MONITORING REQUIREMENTS:

No receiving water monitoring requirements recommended at this time.

Part IV – Rationale and Derivation of Effluent Limitations & Permit Conditions

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

As per [10 CSR 20-7.015(4)(A)], discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream and connection to a regional wastewater treatment facility have been evaluated and determined to be unacceptable for environmental and/or economic reasons.

Not Applicable ☒;

The facility does not discharge to a Losing Stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)], or is an existing facility.

ANTI-BACKSLIDING:

A provision in the Federal Regulations [CWA §303(d)(4); CWA §402(c); 40 CFR Part 122.44(I)] that requires a reissued permit to be as stringent as the previous permit with some exceptions.

☒ - All limits in this operating permit are at least as protective as those previously established; therefore, backsliding does not apply.

ANTIDEGRADATION:

In accordance with Missouri's Water Quality Standard [10 CSR 20-7.031(2)], the Department is to document by means of Antidegradation Review that the use of a water body's available assimilative capacity is justified. Degradation is justified by documenting the socio-economic importance of a discharging activity after determining the necessity of the discharge.

☒ - All discharges authorized under this permit are existing discharges that have previously been authorized under a different permit number. No degradation is proposed and no further review is necessary.

AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY:

As per [10 CSR 20-6.010(3)(B)], ...An applicant may utilize a lower preference continuing authority by submitting, as part of the application, a statement waiving preferential status from each existing higher preference authority, providing the waiver does not conflict with any area-wide management plan approved under section 208 of the Federal Clean Water Act or any other regional sewage service and treatment plan approved for higher preference authority by the Department.

BIOSOLIDS, SLUDGE, & SEWAGE SLUDGE:

Bio-solids are solid materials resulting from wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sludge is any solid, semi-solid, or liquid waste generated from a municipal, commercial, or industrial wastewater treatment plant, water supply treatment plant, or air pollution control facility or any other such waste having similar characteristics and effect. Sewage sludge is solids, semi-solids, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information regarding biosolids and sludge is located at the following web address: <http://dnr.mo.gov/env/wpp/pub/index.html>, items WQ422 through WQ449.

☒ Not applicable;
This condition is not applicable to the permittee for this facility.

COMPLIANCE AND ENFORCEMENT:

Enforcement is the action taken by the Water Protection Program (WPP) to bring an entity into compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and conditions of an operating permit. The primary purpose of the enforcement activity in the WPP is to resolve violations and return the entity to compliance.

Not Applicable ☒;
The permittee/facility is not currently under Water Protection Program enforcement action.

PRETREATMENT PROGRAM:

The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of discharging or otherwise introducing such pollutants into a Publicly Owned Treatment Works [40 CFR Part 403.3(q)].

Pretreatment programs are required at any POTW (or combination of POTW operated by the same authority) and/or municipality with a total design flow greater than 5.0 MGD and receiving industrial wastes that interfere with or pass through the treatment works or are otherwise subject to the pretreatment standards. Pretreatment programs can also be required at POTWs/municipals with a design flow less than 5.0 MGD if needed to prevent interference with operations or pass through.

Several special conditions pertaining to the permittee's pretreatment program may be included in the permit, and are as follows:

- Implementation and enforcement of the program,
- Annual pretreatment report submittal,
- Submittal of list of industrial users,
- Technical evaluation of need to establish local limitations, and
- Submittal of the results of the evaluation

Not Applicable ☒;
The permittee, at this time, is not required to have a Pretreatment Program or does not have an approved pretreatment program.

REASONABLE POTENTIAL ANALYSIS (RPA):

Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants that are or may be discharged at a level that will cause or have the reasonable potential to cause or contribute to an in-stream excursion above narrative or numeric water quality standard.

In accordance with [40 CFR Part 122.44(d)(iii)] if the permit writer determines that any give pollutant has the reasonable potential to cause, or contribute to an in-stream excursion above the WQS, the permit must contain effluent limits for that pollutant.

Not Applicable ☒;

A RPA was not conducted for this facility.

REMOVAL EFFICIENCY:

Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals. Please see the United States Environmental Protection Agency's (EPA) website for interpretation of percent removal requirements for National Pollutant Discharge Elimination System Permit Application Requirements for Publicly Owned Treatment Works and Other Treatment Works Treating Domestic Sewage @ www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18866.htm.

Not Applicable ☒;

Influent monitoring is not being required to determine percent removal.

SANITARY SEWER OVERFLOWS (SSOs), BYPASSES, INFLOW & INFILTRATION (I&I) – PREVENTION/REDUCTION:

Sanitary Sewer Systems (SSSs) are municipal wastewater collection systems that convey domestic, commercial, and industrial wastewater, and limited amounts of infiltrated groundwater and storm water (i.e. I&I), to a POTW. SSSs are not designed to collect large amounts of storm water runoff from precipitation events.

Untreated or partially treated discharges from SSSs are commonly referred to as SSOs. SSOs have a variety of causes including blockages, line breaks, sewer defects that allow excess storm water and ground water to overload the system, lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. A SSOs is defined as an untreated or partially treated sewage release from a SSS. SSOs can occur at any point in an SSS, during dry weather or wet weather. SSOs include overflows that reach waters of the state. SSOs also include overflows out of manholes and onto city streets, sidewalks, and other terrestrial locations. SSSs can back up into buildings, including private residences. When sewage backups are caused by problems in the publicly-owned portion of an SSS, they are considered SSOs.

Not Applicable ☒;

This facility is not required to develop or implement a program for maintenance and repair of the collection system; however, it is a violation of Missouri State Environmental Laws and Regulations to allow untreated wastewater to discharge to waters of the state.

SCHEDULE OF COMPLIANCE (SOC):

A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit.

Not Applicable ☒;

This permit does not contain a SOC.

STORM WATER POLLUTION PREVENTION PLAN (SWPPP):

In accordance with 40 CFR 122.44(k) *Best Management Practices (BMPs)* to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; (2) Authorized under section 402(p) of the CWA for the control of storm water discharges; (3) Numeric effluent limitations are infeasible; or (4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA.

In accordance with the EPA's *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.

Additionally in accordance with the Storm Water Management, a SWPPP is a series of steps and activities to (1) identify sources of pollution or contamination, and (2) select and carry out actions which prevent or control the pollution of storm water discharges.

Applicable ☒;

A SWPPP shall be developed and implemented for each site and shall incorporate required practices identified by the Department with jurisdiction, incorporate erosion control practices specific to site conditions, and provide for maintenance and adherence to the plan.

VARIANCE:

As per the Missouri Clean Water Law § 644.061.4, variances shall be granted for such period of time and under such terms and conditions as shall be specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006 to 644.141.

Not Applicable ☒;

This operating permit is not drafted under premises of a petition for variance.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS:

As per [10 CSR 20-2.010(78)], the amount of pollutant each discharger is allowed by the Department to release into a given stream after the Department has determined total amount of pollutant that may be discharged into that stream without endangering its water quality.

Applicable ☒.

Wasteload allocations were calculated where applicable using water quality criteria or water quality model results and the dilution equation below:

$$C = \frac{(Cs \times Qs) + (Ce \times Qe)}{(Qe + Qs)} \quad (\text{EPA/505/2-90-001, Section 4.5.5})$$

Where C = downstream concentration

Cs = upstream concentration

Qs = upstream flow

Ce = effluent concentration

Qe = effluent flow

Chronic wasteload allocations were determined using applicable chronic water quality criteria (CCC: criteria continuous concentration) and stream volume of flow at the edge of the mixing zone (MZ). Acute wasteload allocations were determined using applicable water quality criteria (CMC: criteria maximum concentration) and stream volume of flow at the edge of the zone of initial dilution (ZID).

Water quality based maximum daily and average monthly effluent limitations were calculated using methods and procedures outlined in USEPA's "Technical Support Document For Water Quality-based Toxics Control" (EPA/505/2-90-001).

Number of Samples "n":

Additionally, in accordance with the TSD for water quality-based permitting, effluent quality is determined by the underlying distribution of daily values, which is determined by the Long Term Average (LTA) associated with a particular Wasteload Allocation (WLA) and by the Coefficient of Variation (CV) of the effluent concentrations. Increasing or decreasing the monitoring frequency does not affect this underlying distribution or treatment performance, which should be, at a minimum, be targeted to comply with the values dictated by the WLA. Therefore, it is recommended that the actual planned frequency of monitoring normally be used to determine the value of "n" for calculating the AML. However, in situations where monitoring frequency is once per month or less, a higher value for "n" must be assumed for AML derivation purposes. Thus, the statistical procedure being employed using an assumed number of samples is "n = 4" at a minimum. For Total Ammonia as Nitrogen, "n = 30" is used.

WLA MODELING:

There are two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality based effluent limits (WQBELs). If TBELs do not provide adequate protection for the receiving waters, then WQBEL must be used.

Not Applicable ☒.

A WLA study was either not submitted or determined not applicable by Department staff.

WATER QUALITY STANDARDS:

Per [10 CSR 20-7.031(3)], General Criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, [40 CFR 122.44(d)(1)] directs the Department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including State narrative criteria for water quality.

WHOLE EFFLUENT TOXICITY (WET) TEST:

A WET test is a quantifiable method of determining if a discharge from a facility may be causing toxicity to aquatic life by itself, in combination with or through synergistic responses when mixed with receiving stream water.

Applicable ☐;

Under the federal Clean Water Act (CWA) §101(a)(3), requiring WET testing is reasonably appropriate for site-specific Missouri State Operating Permits for discharges to waters of the state issued under the National Pollutant Discharge Elimination System (NPDES). WET testing is also required by 40 CFR 122.44(d)(1). WET testing ensures that the provisions in the 10 CSR 20-6.010(8)(A)7. and the Water Quality Standards 10 CSR 20-7.031(3)(D),(F),(G),(I)2.A & B are being met. Under [10 CSR 20-6.010(8)(A)4], the Department may require other terms and conditions that it deems necessary to assure compliance with the Clean Water Act and related regulations of the Missouri Clean Water Commission. In addition the following MCWL apply: §§644.051.3 requires the Department to set permit conditions that comply with the MCWL and CWA; 644.051.4 specifically references toxicity as an item we must consider in writing permits (along with water quality-based effluent limits, pretreatment, etc...); and 644.051.5 is the basic authority to require testing conditions. WET test will be required by all facilities meeting the following criteria:

- ☐ Facility is a designated Major.
- ☐ Facility continuously or routinely exceeds its design flow.
- ☐ Facility (industrial) that alters its production process throughout the year.
- ☐ Facility handles large quantities of toxic substances, or substances that are toxic in large amounts.
- ☐ Facility has Water Quality-based Effluent Limitations for toxic substances (other than NH₃)
- ☐ Facility is a municipality or domestic discharger with a Design Flow ≥ 22,500 gpd.
- ☐ Other – please justify.

Not Applicable ☒;

At this time, the permittee is not required to conduct WET test for this facility.

303(d) LIST & TOTAL MAXIMUM DAILY LOAD (TMDL):

Section 303(d) of the federal Clean Water Act requires that each state identify waters that are not meeting water quality standards and for which adequate water pollution controls have not been required. Water quality standards protect such beneficial uses of water as whole body contact (such as swimming), maintaining fish and other aquatic life, and providing drinking water for people, livestock and wildlife. The 303(d) list helps state and federal agencies keep track of waters that are impaired but not addressed by normal water pollution control programs.

A TMDL is a calculation of the maximum amount of a given pollutant that a body of water can absorb before its water quality is affected. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan will be developed that shall include the TMDL calculation

Not Applicable ☒;

This facility does not discharge to a 303(d) listed stream.

Part V – Effluent Limits Determination

Outfalls #001 & #002– Stormwater discharges only. The volume and duration of discharge will vary and make exact dilution calculations impossible; however the immediate receiving streams are unclassified and the Missouri River provides much dilution. No water quality impacts therefore are expected from the parameters as currently listed.

EFFLUENT LIMITATIONS TABLE:

PARAMETER	UNIT	BASIS FOR LIMITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS**
FLOW	MGD	1	*		*	NO	SAME
BOD ₅	MG/L	1	48		26	YES	45/30
pH	SU	1	6.5 – 9.0		6.5 – 9.0	YES	6.0 – 9.0
TOTAL PETROLEUM HYDROCARBONS	MG/L	9	10		10	NO	SAME
PHENOLIC COMPOUNDS	MG/L	1	0.35		0.17	YES	0.75/0.35
CHEMICAL OXYGEN DEMAND	MG/L	1	360		180	YES	***
BETX	MG/L	9	0.75		0.75	NO	SAME
METHYL TERTIARY BUTYL ETHER (MTBE)	MG/L	9	0.020		0.020	YES	***
ETHANOL	MG/L	9	*		*	YES	***
TOTAL CHROMIUM	MG/L	1	0.73		0.43	YES	1.0/0.75
LEAD, TOTAL RECOVERABLE	µg/L	2/3	188		94	YES	150
TOTAL HARDNESS	MG/L	9	*		*	YES	***
MONITORING FREQUENCY	Please see Minimum Sampling and Reporting Frequency Requirements in the Derivation and Discussion Section below.						

* - Monitoring requirement only.

** - Limitations established in the 2003 operating permit MO-0004774 for these two outfalls.

*** - Parameter not previously established in 2003 operating permit MO-0004774.

Basis for Limitations Codes:

- | | |
|--|------------------------------------|
| 1. State or Federal Regulation/Law | 7. Antidegradation Policy |
| 2. Water Quality Standard (includes RPA) | 8. Water Quality Model |
| 3. Water Quality Based Effluent Limits | 9. Best Professional Judgment |
| 4. Lagoon Policy | 10. TMDL or Permit in lieu of TMDL |
| 5. Ammonia Policy | 11. WET Test Policy |
| 6. Dissolved Oxygen Policy | 12. Antidegradation Review |

OUTFALLS #001 & #002 – DERIVATION AND DISCUSSION OF LIMITS:

- **Flow.** In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the department, which may require the submittal of an operating permit modification.
- **Biochemical Oxygen Demand (BOD₅).** Effluent limitations have been set according to federal categorical standards for stormwater runoff from petroleum refining facilities [40 CFR Part 419.52 (e)(2)].
- **pH.** Effluent limitations are protective and have been set according to the Missouri Department of Natural Resources' guidelines for Industrial Stormwater Effluent Limits.
- **Total Petroleum Hydrocarbons.** Effluent limitations are protective and have been retained from previous state operating permit. These limits are consistent with those given to other facilities in the state of Missouri who perform activities similar to this facility.
- **Phenolic Compounds.** Effluent limitations have been set according to federal categorical standards for stormwater runoff from petroleum refining facilities [40 CFR Part 419.52 (e)(2)].
- **Chemical Oxygen Demand.** Effluent limitations for chemical oxygen demand (COD) have been added to this permit in place of limitations for total organic carbon (TOC). COD limits have been set according to federal categorical standards for stormwater runoff from petroleum refining facilities [40 CFR Part 419.52 (e)(2)].

- **BETX**. Effluent limitations are protective and have been retained from previous state operating permit. BTEX is a measure of Benzene, Ethylbenzene, Toluene and Xylene which are contained in gasoline products that this facility stores. The previous state operating permit for this facility contained effluent limitations for BETX and Benzene as well as monitoring for the remaining individual components of BETX to identify possible stormwater contamination from these chemicals. Discharge monitoring reports from the previous permit cycle show no contamination from any of these parameters at outfalls #001, #002, #003, #004, #006 and #008 and negligible levels from outfall #009. As a result Benzene, Ethylbenzene, Toluene and Xylene have been removed from the current draft permit. If exceedances of BETX limits are found this permit may be reopened to set limits for individual BETX components.
- **Methyl Tertiary Butyl Ether (MTBE)**. Some gasoline can contain MTBE and this facility stores gasoline products. These limits are protective and are consistent with those given to other facilities in the state of Missouri who perform activities similar to this facility.
- **Total Chromium**. Effluent limitations have been set according to federal categorical standards for stormwater runoff from petroleum refining facilities [40 CFR Part 419.52 (e)(2)].
- **Lead, Total Recoverable**. In the past this facility stored tetra-ethyl lead as a gasoline additive. Lead was added to the previous permit in order to address possible lead contamination of stormwater runoff. Industrial stormwater flows have a limited risk to violate chronic water quality standards therefore the Criteria Maximum Concentration (CMC) was calculated to ensure this facility does not violate acute water quality standards. The toxicity of lead in aquatic environments is hardness dependent so the default value for stormwater hardness of 193mg/L was used in the following calculation of the Total Recoverable Lead limit.

Due to the absence of contemporaneous effluent and instream data for total recoverable metals, dissolved metals, hardness, and total suspended solids with which to calculate metals translators, partitioning between the dissolved and absorbed phases was assumed to be minimal (Section 5.7.3, EPA/505/2-90-001). Freshwater criteria conversion factors for dissolved metals were used as the metals translator as recommended in guidance (Section 1.3, 1.5.3, and Table 1, EPA 823-B-96-007). If concurrent site-specific data for total recoverable metals, dissolved metals, hardness, and total suspended solids are provided to the department, partitioning evaluations may be considered and site-specific translators developed.

METAL	CONVERSION FACTORS
	ACUTE
Lead	0.695

Protection of Aquatic Life Acute Criteria (CMC) = 131 µg/L. No mixing allowed; therefore, the CMC = the WLA (after conversion).

Conversion for CMC = $131 / .695 = 188.4 \mu\text{g/L}$

$\text{WLA}_a = 188.4 \mu\text{g/L}$

$\text{LTA}_a = 188.4 \mu\text{g/L} (0.321\dots) = 60.5 \mu\text{g/L}$ [CV = 0.6, 99th Percentile]

$\text{MDL} = 60.5 \mu\text{g/L} (3.11\dots) = 188 \mu\text{g/L}$ [CV = 0.6, 99th Percentile]

$\text{AML} = 60.5 \mu\text{g/L} (1.55\dots) = 94 \mu\text{g/L}$ [CV = 0.6, 95th Percentile, n = 4]

- **Total Hardness**. Monitoring only requirement due to the fact that Metals toxicity varies by hardness.
- **Ethanol**. Monitoring requirement only. This facility stores ethanol to blend with gasoline before loading onto tanker trucks. Ethanol data obtained during the current permit cycle will be used at the next permit renewal to determine if this facility has the reasonable potential to violate water quality standards.

Minimum Sampling and Reporting Frequency Requirements.

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
FLOW	TWICE/YEAR	TWICE/YEAR
BOD ₅	TWICE/YEAR	TWICE/YEAR
pH	TWICE/YEAR	TWICE/YEAR
TOTAL PETROLEUM HYDROCARBONS	TWICE/YEAR	TWICE/YEAR
PHENOLIC COMPOUNDS	TWICE/YEAR	TWICE/YEAR
COD	TWICE/YEAR	TWICE/YEAR
BETX	TWICE/YEAR	TWICE/YEAR
MTBE	TWICE/YEAR	TWICE/YEAR
ETHANOL	TWICE/YEAR	TWICE/YEAR
TOTAL CHROMIUM	TWICE/YEAR	TWICE/YEAR
TOTAL RECOVERABLE LEAD	TWICE/YEAR	TWICE/YEAR

- The 2003 operating permit #MO-0004774 required modified composite sampling from all outfalls for BOD, Phenolic Compounds, Total Chromium, MTBE and Total Recoverable Lead. The US EPA NPDES Permit Writer's Manual (EPA-833-B-96-003) indicates that composite samples are inappropriate for total phenolic compounds and other volatile organic parameters such as MTBE. Moreover this document states that grab samples should be used when composite sampling is impractical. This facility has submitted a request to the department for grab samples for all parameters for the following reasons:
 - a. Composite samples are difficult to collect due the infrequency of contiguous four-hour rain events.
 - b. The number of outfalls and large area of this facility make it difficult to collect composite samples at all outfalls.
 - c. BP has a safety policy prohibiting employees from conducting field work within 30 minutes of a lightning or thunderstorm event.

To address these concerns the 2009 permit renewal for MO-0004774 was drafted with grab samples for all parameters at all outfalls. This type of sampling is consistent with state operating permits issued to facilities involved in the same type of activities as this one.

Part VI – Administrative Requirements

On the basis of preliminary staff review and the application of applicable standards and regulations, the Department, as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions contained herein and within the operating permit. The proposed determinations are tentative pending public comment.

PUBLIC NOTICE:

The Department shall give public notice that a draft permit has been prepared and its issuance is pending. Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in and water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and permittee must be notified of the denial in writing.

The Department must issue public notice of a pending operating permit or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit.

For persons wanting to submit comments regarding this proposed operating permit, then please refer to the Public Notice page located at the front of this draft operating permit. The Public Notice page gives direction on how and where to submit appropriate comments.

☒ - The Public Notice period for this operating permit was from December 17, 2010 to January 16, 2011. No responses received or responses to the Public Notice of this operating permit do not warrant the modification of effluent limits and/or the terms and conditions of this permit.

DATE OF FACT SHEET: NOVEMBER 8, 2010

COMPLETED BY:

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NPDES PERMITS UNIT
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Part VII – Appendices

APPENDIX #1 – FACILITY VIEWS



Figure 1 – Aerial View of Facility

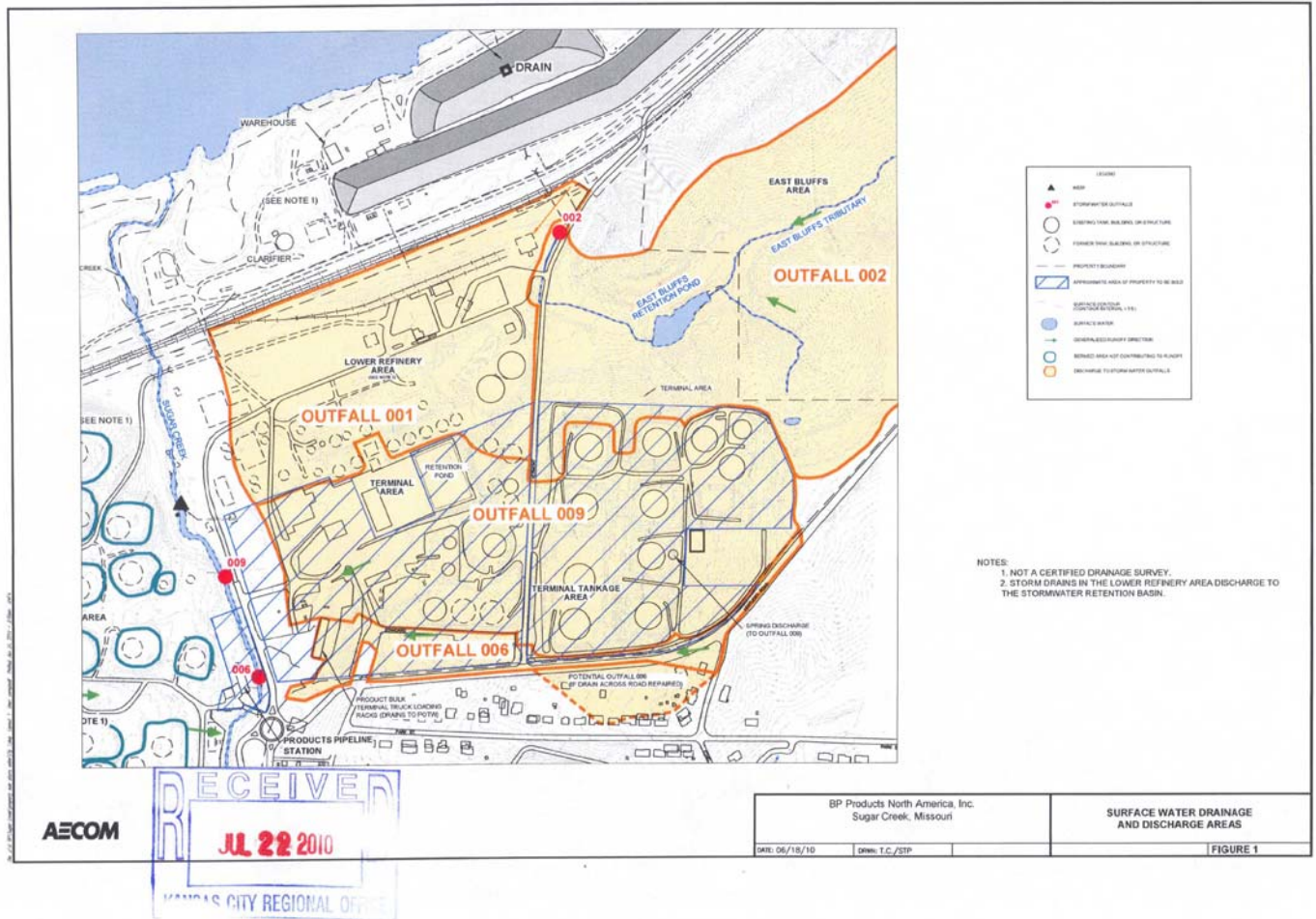


Figure 2 – Drainage Areas for Outfalls #001 & #002, labeled Outfalls #006 & #009 respectively in this diagram.